

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

SAMSON TUG AND BARGE CO., INC.,
an Alaska Corporation

Plaintiff/Appellant

vs.

UNITED STATES OF AMERICA,

Defendant/Appellee

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Case Number: A03-006 CV
Admiralty JWS

**JOINT STIPULATION OF PARTIES TO
MODIFY CERTAIN DEADLINES,
WITH PROPOSED ORDER**

COME NOW the parties hereto and respectfully propose this Stipulation and Order regarding certain deadlines in this case. Numerous depositions and document exchanges have occurred over the summer, and the parties' respective experts have both submitted reports. Depositions of those experts have occurred. The parties have exchanged proposed mediators for this matter, and are progressing towards setting up the mediation as soon as is practicable. Prior to this mediation, however, the parties have agreed that a continuation of Defendant's deposition of Plaintiff's expert is necessary. A limited amount of document production will also occur prior to this deposition. To accommodate the schedules of the parties, their counsel and Plaintiff's expert, counsel have conferred and agreed that a limited modification of some of the remaining deadlines previously approved by the Court is needed. Accordingly the parties are filing this Joint Stipulation and Proposed Order to set forth their need for a modification of the case schedule in certain limited regards, and jointly respectfully request the Court's approval of the deadlines proposed herein.

THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:

- (1) A continuation of Defendant's deposition of Plaintiff's expert shall occur on or before November 16, 2007.
- (2) The close of discovery shall be November 23, 2007.
- (3) The last date for filing dispositive motions shall be December 14, 2007.

Respectfully submitted,

Dated: September 28, 2007

/s/ Richard D. Gluck
Richard D. Gluck
Harold G. Bailey, Jr.
Garvey Schubert Barer
1000 Potomac Street, NW, 5th Floor
Washington, DC 20007
Counsel for Samson Tug and Barge Co., Inc.

Dated: September 28, 2007

/s/ William G. Royce
William G. Royce
Law Office of William G. Royce
1227 West 9th Avenue
Suite 200
Anchorage, AK 99501
Counsel for Samson Tug & Barge. Co., Inc.

Dated: September 28, 2007

/s/ Jeanne M. Franken (consent)
Jeanne M. Franken
Trail Attorney
Torts Branch, Civil Division
U.S. Department of Justice
7-5393 Federal Building
P.O. Box 36028
San Francisco, CA 94102-3463
Counsel for the United States of America